

**VIRTUAIN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,  
**Plaintiff,**

**v.**

JULIO M. HERRERA-VELUTINI,  
**Defendant.**

CRIMINAL NO. 22-342  
(SCC)(HRV)

**UNOPPOSED MOTION FOR STATUS CONFERENCE**

**TO THE HONORABLE COURT:**

COMES NOW, Julio M. Herrera-Velutini (“Mr. Herrera”), by and through the undersigned counsel, and hereby respectfully request this Court to schedule a status conference, if possible, on **February 11, 13, or 14, 2025**, to address pending motions and case management issues. In support of this motion, Mr. Herrera states as follows:

The trial for this case is currently scheduled for August 25 of this year. Several motions, including those related to third-party discovery, are pending before the court.<sup>1</sup>

The deadline for filing dispositive and suppression motions is March 31, 2025. Information expected to be obtained through third-party discovery is relevant to support these motions. Based on discussions with other defense counsel, their clients would also benefit from a status conference. The Government has no objection to the request. The parties are available on February 11, 13, or 14, 2025. The Government prefers February 11, provided that this date is acceptable to the court. **For the convenience of all the parties, Mr. Herrera also requests that the hearing be held virtually.**

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<sup>1</sup> The pending motions include Motion to Compel the Government to Identify Brady Material (Dkt. 662); Ex-Parte Motion to Produce (Dkt. 670); and Motion in Limine 404 (b) materials (Dkt. 683).

Therefore, Mr. Herrera respectfully requests a status conference to discuss these issues and ensure that the defendants can have the information needed to comply with the Court's schedule.

**WHEREFORE**, Mr. Herrera respectfully requests that this Court schedule a status conference to be held virtually, at its earliest convenience, if possible, on February 11, 13, or 14, 2025.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on the 4th day of February 2025.

**DLA Piper (Puerto Rico) LLC**

/s/ Sonia I. Torres-Pabón  
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**CERTIFICATE OF SERVICE**

It is hereby certified that on this date, the present motion is filed with the Clerk of the Court through the CM/ECF electronic system, which will notify and provide copies to all parties of record.

/s/ Sonia I. Torres-Pabón